

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOANNE M. ROYER,)	
)	
Plaintiff,)	
v.)	
)	CIVIL ACTION NO:
BLUE CROSS BLUE SHIELD OF)	NO: 05-CV-10448-GAO
MASSACHUSETTS, INC., BLUE CROSS)	
BLUE SHIELD LONG-TERM)	
DISABILITY BENEFIT PLAN, a/k/a)	
OMNIBUS WELFARE BENEFITS)	
PLAN, KEMPER NATIONAL)	
SERVICES, INC., BROADSPIRE)	
SERVICES, INC., AND SHELDON)	
MYERSON, MD.,)	
)	
Defendants.)	
)	

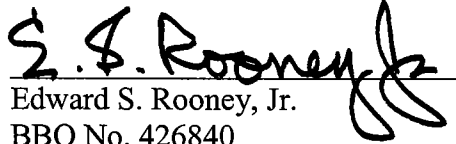
MOTION TO ADMIT ATTORNEY *PRO HAC VICE*

Pursuant to Local Rule 83.5.3 and the attached Affidavit and Certificate of Good Standing, the undersigned counsel moves the admission *pro hac vice* of Rachel Urquhart, Esquire and Michael Leonard, Esquire (the “Admittees”), of the law firm of Meckler, Bulger & Tilson, LLP, 123 North Wacker Drive, Suite 1800, Chicago, Illinois 60606. The Admittees will be representing the following defendants: Blue Cross Blue Shield Long-Term Disability Benefit Plan, a/k/a Omnibus Welfare Benefits Plan, Kemper National Services, Inc., Broadspire Services, Inc. and Sheldon Myerson, M.D. in the above-entitled case.

Plaintiff’s counsel Bernard A. Kansky has advised the undersigned that he has no opposition to this motion.

Respectfully submitted,

DATED: June 5, 2006

_____

Edward S. Rooney, Jr.

BBO No. 426840

ECKERT SEAMANS CHERIN

& MELLOTT, LLC

One International Place, 18th Floor

Boston, MA 02110

(617) 342-6800

OF COUNSEL:

Michael Leonard, Esq.

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123 North Wacker Drive, Suite 1800

Chicago, IL 60606

312-474-7900

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOANNE M. ROYER,

Plaintiff,

vs.

BLUE CROSS BLUE SHIELD OF
MASSACHUSETTS, INC.; BLUE CROSS BLUE
SHIELD LONG-TERM DISABILITY BENEFIT
PLAN, a/k/a OMNIBUS WELFARE BENEFITS
PLAN; KEMPER NATIONAL SERVICES, INC.;
BROADSPIRE SERVICES, INC.; and
SHELDON MYERSON, M.D.,

Defendants.

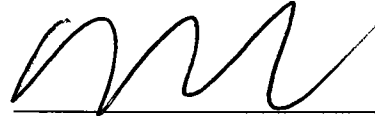
Civil Action No:
05-CV-10448-GAO

AFFIDAVIT

I, Michael I. Leonard, being first duly sworn and under oath state that I am fully familiar with the facts set forth herein, and would competently and truthfully testify the same if called upon to do so at deposition or trial.

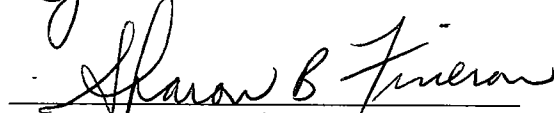
1. My name is Michael I. Leonard.
2. I am admitted to practice before the Supreme Court of the State of Illinois and the United States District Court for the Northern District of Illinois.
3. I am a member in good standing in every jurisdiction where I have been admitted to practice.
4. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.



Michael I. Leonard

SUBSCRIBED AND SWORN to
before me this 13th day of
June, 2006.


Notary Public

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CERTIFICATE OF GOOD STANDING



United States of America

}ss. Michael Irving Leonard

Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Michael Irving Leonard
was duly admitted to practice in said Court on (12/19/1991)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (06/13/2006)

Michael W. Dobbins, Clerk,

By: Liri Isufi
Deputy Clerk

A handwritten signature in black ink, appearing to read "Liri Isufi", written over a horizontal line.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOANNE M. ROYER,

Plaintiff,

vs.

BLUE CROSS BLUE SHIELD OF
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SHIELD LONG-TERM DISABILITY BENEFIT
PLAN, a/k/a OMNIBUS WELFARE BENEFITS
PLAN; KEMPER NATIONAL SERVICES, INC.;
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Defendants.

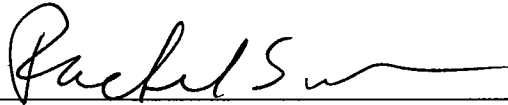
Civil Action No:
05-CV-10448-GAO

AFFIDAVIT


I, Rachel S. Urquhart, being first duly sworn and under oath state that I am fully familiar with the facts set forth herein, and would competently and truthfully testify the same if called upon to do so at deposition or trial.

1. My name is Rachel S. Urquhart.
2. I am admitted to practice before the Supreme Courts of Michigan and Illinois, the United States Courts of Appeals for the Sixth Circuit, and the United States District Courts for the Eastern and Western Districts of Michigan and the Northern District of Illinois.
3. I am a member in good standing in every jurisdiction where I have been admitted to practice.
4. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.


Rachel S. Urquhart

SUBSCRIBED AND SWORN to
before me this 13th day of
June, 2006.


Notary Public



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CERTIFICATE OF GOOD STANDING



United States of America

}ss. Rachel Shaskos Urquhart

Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Rachel Shaskos Urquhart
was duly admitted to practice in said Court on (03/24/2006)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (06/13/2006)

Michael W. Dobbins, Clerk,

By: Liri Isufi
Deputy Clerk

A handwritten signature in black ink, appearing to read "Liri Isufi", written over a circular stamp or seal.